

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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LUIS MORAN AND BCETTY MORAN,
Plaintiffs,
- against -

08CIV2243

100 CHURCH, LLC, 120 BROADWAY
CONDOMINIUM (CONDO #871), 120
BROADWAY HOLDINGS, LLC, 120
BROADWAY PROPERTIES, LLC, 120
BROADWAY, LLC, 222 BROADWAY, LLC,
ALAN KASMAN DBA KASCO, AMBIENT
GROUP, INC., AMERICAN EXPRESS BANK,
LTD, AMERICAN EXPRESS COMPANY,
AMERICAN EXPRESS TRAVEL RELATED
SERVICES COMPANY, INC., ANN TAYLOR
STORES CORPORATION, BATTERY PARK
CITY AUTHORITY, BFP ONE LIBERTY PLAZA
CO., LLC,, BFP TOWER C CO. LLC, BFP
TOWER C MM LLC, BLACKMON-MOORINGSTEAMATIC
CATASTOPHE, INC. D/B/A BMS
CAT, BOARD OF MANAGERS OF THE 120
BROADWAY CONDOMINIUM (CONDO #871),
BROOKFIELD FINANCIAL PROPERTIES, INC,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC, CHASE
MANHATTAN BANK CORPORATION,
CITIBANK, NA, CUNNINGHAM DUCT
CLEANING CO., INC., CUSHMAN &
WAKEFIELD, INC., ENVIROTECH CLEAN AIR,
INC., GENERAL RE SERVICES CORP., GPS
ENVIRONMENTAL CONSULTANTS, INC,
HILLMAN ENVIRONMENTAL GROUP, LLC,
INDOOR ENVIRONMENTAL TECHNOLOGY,
INC., KASCO RESTORATION SERVICES CO.,
LAW ENGINEERING P.C, LEHMAN
BROTHERS HOLDINGS INC., LEHMAN
BROTHERS, INC, LEHMAN COMMERCIAL
PAPER, INC., MERRILL LYNCH & CO, INC,
NATIONAL ASSOCIATION OF SECURITIES

DEALERS, INC., NEW OBERTY PLAZA
 LP, NEW YORK CITY INDUSTRIAL
 DEVELOPMENT AGENCY, NEW YORK CITY
 INDUSTRIAL DEVELOPMENT
 CORPORATION, NOMURA HOLDING
 AMERICA, INC, NOMURA SECURITIES
 INTERNATIONAL, INC, ONE LIBERTY
 PLAZA, ROYAL AND SUN ALLIANCE
 INSURANCE GROUP, PLC, SILVERSTEIN
 PROPERTIES, INC., STRUCTURE TONE (UK),
 INC., STRUCTURE TONE GLOBAL SERVICES,
 INC., THE BOARD OF MANAGERS OF THE
 ONE LIBERTY PLAZA CONDOMINIUM
 (CONDO #1178), THE CITY UNIVERSITY OF
 NEW YORK, THE ONE LIBERTY PLAZA
 CONDOMINIUM (CONDO #1178), TOSCORP
 INC., TRAMMELL CROW COMPANY,
 TRAMMELL CROW CORPORATE SERVICES,
 INC., TRC ENGINEERS, INC., TUCKER
 ANTHONY, INC., UBS FINANCIAL SERVICES,
 INC. F/K/A SWISS BANK CORPORATION,
 VERIZON NEW YORK, INC, WESTON
 SOLUTIONS, INC., WFP ONE LIBERTY PLAZA
 CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP,
 CORP., WFP RETAIL CO. G.P. CORP., WFP
 RETAIL CO. L.P., WFP TOWER A CO., WFP
 TOWER A CO. G.P. CORP., WFP TOWER A.
 CO., L.P., WFP TOWER B CO. G.P. CORP., WFP
 TOWER B HOLDING CO., LP, WFP TOWER B.
 CO., L.P., WFP TOWER D CO. G.P. CORP., WFP
 TOWER D HOLDING CO. I L.P., WFP TOWER
 D HOLDING CO. II L.P., WFP TOWER D
 HOLDING I G.P. CORP., WFP TOWER D. CO.,
 L.P., WORLD FINANCIAL PROPERTIES, L.P.,
 AND ZAR REALTY MANAGEMENT CORP., ET
 AL

Defendants.

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ENVIROTECH CLEAN AIR'S ANSWER TO COMPLAINT BY ADOPTION

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.
 ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by
 Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-
 referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated


August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
May 23, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
Attorneys for Defendant –Envirotech
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BY: _____
Heather L. Smar (4622)